

From: George.Madison@treasury.gov
Sent: Thursday, April 26, 2012 12:01 PM
To: Comments
Cc: Brian.Sonfield@treasury.gov; Rochelle.Granat@treasury.gov
Subject: Improving Agency Coordination

Thank you for the opportunity to review the draft recommendation, "Improving Agency Coordination in Shared Regulatory Space." We read the report and draft recommendation with great interest.

Although we support the premise that agencies should coordinate efforts, we have a concern about the draft recommendation. In particular, the draft recommendation provides that agencies "should adopt policies and procedures for facilitating coordination with other agencies." An undue emphasis on adopting formal policies and procedures might inappropriately limit the Department's discretion to choose, on a case-by-case basis, the most appropriate mechanism for engaging in policy coordination. The Department has a variety of policy areas that are within the "shared regulatory space" of other agencies, which have yielded robust consultations and reengagement with, for example, financial regulators, USDA, FDA, HUD, HHS, Labor, Education, SSA, VA, OPM, and Energy. A one-size-fits-all approach may pose unnecessary constraints.

Again, thank you for the opportunity to review the draft recommendation. We look forward to our further collaboration on this and other ACUS projects.

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General Counsel